

JAMES R. GREINER, ESQ.
CALIFORNIA STATE BAR NUMBER 123357
LAW OFFICES OF JAMES R. GREINER
555 UNIVERSITY AVENUE, SUITE 290
SACRAMENTO, CALIFORNIA 95825
TELEPHONE: (916) 649-2006
FAX: (916) 649-2006

ATTORNEY FOR DEFENDANT
BLANCHE PATRICIA HASSALL

IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,)	CR.-S-05-128-LKK
PLAINTIFF,)	STIPULATION AND
v.)	ORDER TO CONTINUE STATUS
BLANCHE PATRICIA HASSALL,)	CONFERENCE AND FINDING OF
et al.,)	EXCLUDABLE TIME
DEFENDANTS.)	

The United States of America represented by U.S. Attorney Mr. Steve Lapham, defendant Mr. James Kalfsbeek, represented by his attorney Scott L. Tedmon, , defendant Blanche Patricia Hassal represented by her attorney James R. Greiner, defendant Amy Polnoff represented by her attorney Joseph Shemaria, defendant David Polnoff represented by his attorney Stephaine Ames, defendant Louise Renfro represented by his attorney Candace Fry, and defendant Ms. Donna Rowe also known as Donna Willis represented by her attorney Joseph Wiseman hereby stipulate and agree as follows:

1. The current status conference in this case is set for Tuesday, January 9, 2007, and this may be vacated by the Court;
2. A new status conference may be set by the Court for Tuesday, April 10, 2007,

1 at 9:30 a.m.;

2 3. Time has been previously excluded by agreement and stipulation of the parties
3 and Order of this Court under local Code T-2 and T-4, Title 18 U.S.C. section
4 3161(h)(8)(B)(ii) and (iv) and the parties agree and stipulate to the Court continuing to
5 make this finding of excludable time based on the fact that the 34 count indictment
6 charges the defendants with a multitude of charges including: Title 18 U.S.C. section
7 371-Conspiracy; Title 18 U.S.C. section 1341-Mail Fraud; Title 18 U.S.C. section
8 1343-Wire Fraud; Title 18 U.S.C. section 1957-Money Transactions in Criminally
9 Derived Property and Title 18 U.S.C. section 1956(a)(1)(B) and 2-Money Laundering
10 and Aiding and Abetting and to date the government has provided defense counsel
11 with 2,530 hard pages of discovery. There is over 400,000 pages of discovery being
12 stored over at the Department of Insurance that is being made available for review to
13 defense counsel. In addition Defense counsel of defendant Hassall has been in contact
14 with the FBI and is arranging for the following: the ability of defense counsel to
15 review information seized by the FBI off of approximately eleven (11) computers.
16 Defense Counsel at first believed that copying of those 11 hard drives would be
17 reasonable and feasible but after discussions with the FBI that may not be the case. It
18 maybe more cost effective to review the material at the Sacramento FBI office. That is
19 in the process of being worked out. In addition, the FBI and defense counsel are
20 working on several dates to view additional information the FBI has about the financial
21 part of the case. Again, this will reviewing of information will take place at the
22 Sacramento FBI office. The case spans both the United States and Canada, so it is truly
23 international in scope, thus making the investigation and preparation extensive for
24 defense counsel.

25 4. The proposed new status conference date of Tuesday, April 10, 2007 has been
26 checked with the Court's courtroom deputy and is available. All counsel has given
27 present counsel authority to sign on their behalf either by telephone conference or e
28

1 mail authorization.

2 It is so stipulated to.

3 MCGREGOR W. SCOTT
4 UNITED STATES ATTORNEY

5 /s/ R. Steven Lapham
6 DATED: 1-5-07 With telephone authorization
7 R. STEVEN LAPMAN
8 ASSISTANT UNITED STATES ATTORNEY
9 ATTORNEY FOR THE PLAINTIFF

10 DATED: 1-5-07 LAW OFFICE OF SCOTT L. TEDMON

11 /s/ Scott L. Tedmon

12 SCOTT L. TEDMON
13 ATTORNEY FOR JAMES KALFSBEEK

14 DATED: 1-5-07 LAW OFFICE OF DWIGHT M. SAMUEL

15 /s/ Dwight M. Samuel
16 With telephone authorization

17 DWIGHT M. SAMUEL
18 ATTORNEY FOR KURT LAKOTA

19 DATED: 1-5-097 LAW OFFICE OF ROBERT J. PETERS

20 /s/Robert J. Peters
21 With telephone authorization

22 ROBERT J. PETERS
23 ATTORNEY FOR SHERWOOD T. RODRIGUEZ

24 DATED: 1-5-07 LAW OFFICE OF JOSEPH SHEMARIA

25 /s/ Joseph Shemaria
26 With telephone and e mail authorization

27 JOSEPH SHEMARIA
28 ATTORNEY FOR AMY POLNOFF

DATED: 1-5-07 LAW OFFICE OF CANDACE A. FRY

/s/ Candace A. Fry
With e mail authorization

CANDACE A. FRY
ATTORNEY FOR LOUISE RENFRO

1 DATED: 1-5-07

LAW OFFICE OF JOSEPH J. WISEMAN

2 /s/ Joseph J. Wiseman

3 JOSEPH J. WISEMAN
ATTORNEY FOR DONNA ROWE

4 DATED: 1-5-07

STEPHANIE AMES ATTORNEY AT LAW

5 /s/Stephanie Ames
6 With e mail authorization

7 STEPHANIE AMES
ATTORNEY FOR DAVID POLNOFF

8 DATED: 1-5-07

LAW OFFICES OF JAMES R. GREINER

9 /s/James R. Greiner

10 JAMES R. GREINER
11 ATTORNEY FOR BLANCHE HASSALL

12
13 ORDER

14 FOR GOOD CAUSE APPEARING

15 IT IS SO ORDERED.

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17 DATED: January 5, 2007

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21 LAWRENCE K. KARLTON
22 SENIOR JUDGE
23 UNITED STATES DISTRICT COURT
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